

EXHIBIT A – PART 1

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FIRM OVERVIEW

Motley Rice LLC was founded on April 28, 2003 by Ronald L. Motley, Joseph F. Rice and nearly 50 other attorneys. The firm is one of the nation's largest all plaintiffs law firms. Our attorneys, assisted by over 350 support personnel, are proven leaders in litigation, demonstrating extensive courtroom experience and an in-depth understanding of the law. The firms attorneys are internationally recognized for their pioneering work representing asbestos victims, States' Attorneys General in their landmark litigation against Big Tobacco, the 9/11 families and survivors in their groundbreaking lawsuit against terrorist financiers, and hundreds of thousands of other citizens harmed by the wrongdoing of others. The attorneys of Motley Rice LLC continue to seek justice in the areas of: aviation disaster; catastrophic injury; complex case resolution; securities and consumer fraud; environmental hazards and contamination; medical negligence and medical device defects; occupational disease and toxic torts; and transportation defects, whistleblower protection, and other mass torts. The firm has offices in Barnwell and Mt. Pleasant, South Carolina; Providence, Rhode Island; Hartford, Connecticut; and Atlanta, Georgia. Motley Rice attorneys have dealt with cases in Latin America, Canada and many other countries.

Motley Rice attorneys, with more than several hundred years of collective trial experience with litigation practice across the United States, first gained widespread national recognition for the first successful representations of injured persons against the asbestos industry. Our attorneys' practice has included Dalkon Shield, breast implants, defective medical devices, lead poisoning, and other mass and complex tort litigation including tobacco. In the last decade, Motley Rice attorneys were selected by 26 States' Attorneys General to represent them against the tobacco industry in recovering medical costs associated with smoking under novel legal and equitable theories that Motley Rice attorneys spearheaded – resulting in a \$246 billion settlement agreement. The Firm also represents individuals and plaintiffs in complex litigation involving civil racketeering (RICO), securities fraud, insurance fraud, tire and vehicle defects, defective drugs, class actions, toxic torts, workplace exposures, nursing home negligence, multi-district litigation, and representation related to the September 11, 2001 acts of terrorism.



CIVIL LITIGATION

Motley Rice lawyers and extensive support staff have experience in all types of civil litigation. The Firm's attorneys routinely litigate complex cases involving multiple parties in state and federal jurisdictions throughout the United States, either as sole counsel for the plaintiffs or in association with local counsel and other firms. The Firm's lawyers have also distinguished themselves in the use of alternative dispute resolution, such as negotiation, mediation and arbitration, in some cases making it possible to avoid protracted litigation. Motley Rice LLC employs state-of-the-art technology by using video conferencing, direct access to the Internet for attorneys and support staff, and a computer-based document management system which enables the Firm to process and enter into the database thousands of medical articles, liability documents and all other information and documents utilized in litigation proceedings.

Motley Rice LLC attorneys are involved in a wide range of civil litigation cases. These cases involve representing victims injured from defective products, product failures, premise liability, automobile crashes and various other negligent acts or malpractice. With over 60 lawyers, the Firm has the ability to act quickly in protecting the rights of individuals as new product dangers become apparent. The lawyers of Motley Rice LLC have been associated as counsel in litigation involving personal injury claims of all kinds, including cases related to:

Asbestos	Bankruptcy
Tobacco	Dram Shop Litigation
Lead	Drug Product Liability
Medical Malpractice	Implants & Prostheses
Medical Device Litigation	MDL Practice
Kerosene Heaters	Fires
Pesticides	Aviation Disasters
Flooding	Motorcycles
Chemical or Toxic Spills	Engineering Malpractice
Negligence	Premises Liability
Vehicle Defect	Tire Defect
Battery Explosions	Negotiation, Settlement & Claims



MULTIPLE PARTY LITIGATION

The attorneys of Motley Rice LLC have substantial experience in multiple party litigation, including the following class and consolidated actions:

Plaintiffs' Liaison counsel, Linscomb v. Pittsburgh Corning Corp., et al., a national class action pending on behalf of asbestos victims nationwide in the United States District Court for the Eastern District of Texas, Beaumont Division.

Executive committee member, In Re: Asbestos School Litigation, a national school asbestos class action pending in the United States District Court for the Eastern District of Pennsylvania.

Lead plaintiffs' counsel in Central Wesleyan College v. W.R. Grace Co., et al., a national asbestos property damage class action pending in the United States District Court for the District of South Carolina, Charleston Division.

Lead plaintiffs' counsel in Carl Wells v. Raymark Industries, a national asbestos personal injury class action filed in United States District Court of Kansas, Wichita Division, in which 19,684 claims were resolved.

Counsel for class representative in Raytech v. Earl White, an asbestos bankruptcy related class action pending in the United States District Court of Connecticut.

Co-lead counsel for plaintiffs in Cimino v. Pittsburgh Corning, et al., an asbestos personal injury class action on behalf of 2,300 plaintiffs pending in the United States District Court for the District of Texas, Beaumont Division.

Co-lead plaintiffs' counsel in Chatham v. AC&S, et al., a consolidated asbestos personal injury action involving 300 plaintiffs in the Circuit Court of Harris County, Texas.



Co-lead plaintiffs' counsel in Mary Abrahms, et al., v. GAF Corp., et al., a consolidated asbestos personal action involving in excess of 6,000 plaintiffs pending in the Mississippi State Circuit Court at Jackson County.

Co-liaison plaintiffs' counsel in 3,000 asbestos personal injury cases pending in the Third Judicial Circuit of Illinois, Madison County, Illinois.

Co-lead counsel in a consolidated asbestos personal injury action involving 540 plaintiffs pending in the Superior Court of Alameda County, California.

Co-lead counsel for plaintiffs in In Re: Asbestos Products Liability Litigation, MDL 875.

Numerous consolidated asbestos trials including 87 consolidated cases in Danville, Illinois; 300 consolidated cases in the United States District Court, Western District of New York, Rochester, New York; 42 consolidated cases in State Court in Mississippi; and 315 consolidated cases in the Circuit Court of Kanawha County, West Virginia. (The latter tried to successful plaintiffs' verdict.)

Plaintiffs' steering committee and plaintiffs' liaison counsel in In Re: Showa Denko K.K. L-tryptophan Products Liability Action M.D.L. No. 865.

Member Interim Plaintiffs' steering committee and Multiple Plaintiffs' Counsel in In Re: San Juan DuPont Plaza Hotel Fire Litigation M.D.L. 721.

Plaintiffs' lead counsel in In Re: Kansas Asbestos Cases in the United States District Court for the District of Kansas; In Re: Madison County Illinois Asbestos Litigation, and In Re: Wayne County Michigan Asbestos Cases.



Class counsel in Carol Lee Whitfield, et al., v. Sangamo Weston, et al., a PCB personal injury and property damage class action settled while pending before the United States District Court for the District of South Carolina, Greenville Division.

Lead counsel in a jet fuel pollution case involving the consolidated property damage and personal injury claims of multiple plaintiffs in the Gold Cup Springs subdivision, titled Dennis Bates, et al. v. Tenco Services, Inc., in the United States District Court for the District of South Carolina, Charleston Division.

Appointed to a three (3) person steering committee on the Food Lion Multidistrict Litigation Panel.

Plaintiffs' lead counsel in a case involving ten (10) persons injured in a crane disaster in Florence County, South Carolina.

Plaintiffs' steering committee and plaintiffs' liaison counsel in In Re: Policy Management Systems Corp., a securities case filed in the United States District Court for the District of South Carolina, Columbia Division.

SECURITIES LITIGATION

In February 2006, Motley Rice LLC expanded its securities litigation practice with the opening of an office in Atlanta, Georgia and the addition of four new members. Prior to joining Motley Rice, these members had served in leading roles in the prosecution of the following securities litigation in which their former firms had served as lead or co-lead counsel:

In re AFC Enterprises Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:03-CV-817-TWT



In re BellSouth Corporation Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:02-2142-WSD

In re Boston Chicken Sec. Litig., United States District Court for the District of Colorado, Civil Action No. 1:97-CV-01435-WDM

In re Campbell Soup Sec. Litig. United States District Court for the District of New Jersey, Civil Action No. 1:2000cv00512

In re Choicepoint, Inc., Sec. Litig. United States District Court for the Northern District of Georgia, Civil Action No. 1:05-CV-686-JTC

In re Cryolife Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:02-CV-1868-BBM

In re First Horizon Pharmaceutical Corporation Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:02-CV-2332-JOF

In re Friedman's Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:03-CV-3475-WSD

Garfield v. NDCHealth Corporation, United States District Court for the Northern District of Georgia, Civil Action No. 1:04-CV-970-WSD

In re HealthTronics Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:03-CV-2800-CC

In re InterCept Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:03-567-ODF

In re JDN Realty Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1-00-CV-0396-RWS

In re MicroWarehouse Sec. Litig., United States District Court for the District of Connecticut, Civil Action No. 3:96-cv-01920-DJC

In re Mirant Corporation Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:02-CV-1467-WSD



In re Policy Management Sec. Litig., United States District Court for the District of South Carolina, Civil Action No. 3:00-0130-17

In re Premiere Technologies, Inc. Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:98-CV-1804-JOF

In re Profit Recovery Group International, Inc., Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:00-CV-1416-CC

In re Providian Financial Corp. Sec. Litig., United States District Court for the Northern District of California, Master File No. C-01-3952-CRB

In re Rite Aid Sec. Litig., United States District Court for the Eastern District of Pennsylvania, Civil Action No. 2:10-md-01360-SD

In re Scientific-Atlanta, Inc., Sec. Litig., Civil Action No. 1:01-CV-1950-RWS

In re ValuJet, Inc. Sec. Litig., United States District Court for the Northern District of Georgia, Civil Action No. 1:96-1355-TWT.

SPECIALIZED BANKRUPTCIES

Motley Rice attorneys serve on several committees in national bankruptcies including:

Select counsel to the asbestos claimants' committee in the Johns-Manville bankruptcy pending in the United States Bankruptcy Court for the Southern District of New York;

Claimants' committee in the H.K. Porter, National Gypsum, Raytech, Rock Wool and M.H. Detrick asbestos related bankruptcies;

Claimants' committee in In Re: A.H. Robins, a Chapter 11 Reorganization involving Dalkon Shield victims nationwide;



Counsel to one of the members of the Creditor's Committee representing the asbestos victims and Chairman of the Select Counsel for the Beneficiaries;

Claimants Committee in the Camall Chapter 11, the first bankruptcy associated with the Fen-Phen litigation;

Class Counsel in the In re: Trebol Motors Corporation and In re: Trebol Motors Distributors Corp., actively defending a \$143,000,000 class action judgment claim on behalf of a class of defrauded purchasers of Volvo automobiles.



THE FIRM'S MEMBERS

RONALD MOTLEY

Ronald L. Motley is internationally recognized as one of America's most dynamic, accomplished and skilled trial lawyers. Over a career spanning more than three decades, his persuasiveness before a jury and his ability to break new legal and evidentiary ground has brought to justice two once-invincible giant industries whose malfeasance took the lives of millions of Americans — asbestos and tobacco.

Today, Motley is once again advancing cutting-edge litigation as lead counsel for more than 6,500 family members and survivors of the September 11, 2001 terrorist attacks seeking justice against al Qaeda's financiers.

Motley has won numerous awards for his ability to win justice and compensation for his clients and for his seminal impact on the course of civil litigation. In 1998, he was named Harry M. Philo Trial Lawyer of the Year by the 50,000-member Association of Trial Lawyers of America and received the President's Award of the National Association of Attorneys General. The Campaign for Tobacco-Free Kids gave him their Youth Advocates of the Year Award in 1999. Business Week magazine characterized Motley's courtroom skills as "dazzling." American Lawyer dubbed him "The man who took on Manville," and The National Law Journal has ranked him, "One of the most influential lawyers in America."

His combination of legal and trial skills, personal charisma, nose-to-the-grindstone hard work and record of success has enabled Motley, a 1971 graduate of the University of South Carolina School of Law, to build Motley Rice LLC into one of the world's leading plaintiffs' law firms concentrating in highly complex litigation.



JOSEPH RICE

Motley Rice LLC member Joe Rice is internationally renowned as a skillful, innovative, tough and masterful negotiator of landmark settlements of highly complex litigation. Rice is best known for his central role in crafting the landmark settlement on behalf of the States Attorneys General, in which the tobacco industry agreed to reimburse states for smoking-related health costs, resulting in the largest civil settlement in history.

Rice's work on the tobacco settlement only expanded the huge impact that he has made resolving difficult litigation in asbestos and other toxic tort areas. Named one of the nation's "Five Most Respected Plaintiff Attorneys" in a poll of defense counsel and legal scholars conducted by Corporate Legal Times, Rice was cited time after time as one of the toughest, sharpest and hardest-working litigators they have ever faced. As the article notes, "For all his talents as a shrewd negotiator . . . Rice has earned most of his respect from playing fair and remaining humble."

He combines a meticulous and exhaustive capacity for numbers-crunching with a creative mind that thinks outside the box in identifying solutions to difficult problems that win justice for clients.

In 1998, Rice received the President's Award of the National Association of Attorneys General. In 1999 and 2000, Rice served on the faculty at Duke University School of Law as a Senior Lecturing Fellow. Rice earned a Bachelor of Science and J.D. degree from the University of South Carolina and has also taught classes at the USC and Duke Law Schools on the art of negotiating.



LAUREN ANTONINO

Joining Motley Rice in 2006 as a member, Lauren Antonino focuses primarily on the firm's Securities and Consumer Fraud practice group. Antonino has over eighteen years of complex litigation experience, including commercial, mass tort and securities class action litigation. Her experience includes leading major securities fraud cases, including *In re JDN Realty Company*, *In re Premiere Technologies Sec. Litig.*, *In re InterCept Sec. Litig.*, and *In re HealthTronics Sec. Litig.*

Antonino is a Phi Beta Kappa graduate of Duke University where she earned an A.B. degree with magna cum laude honors in 1984. She is a 1987 graduate of the University of Virginia School of Law where she served on the managing board of the Virginia Tax Review and as a defense counsel for the University Honor System. Following law school, she clerked for the late Honorable M. Oliver Koelsch of the United States Court of Appeals for the Ninth Circuit in Seattle, Washington.

Antonino has been a featured speaker on securities class action litigation, employment law, alternative dispute resolution and product liability issues. She has served as a presenter for public pension fund conferences, the American Bar Association Convention, the Alternative Dispute Resolution Convention and ICLE. In July 2000, her article entitled "The Seven Steps of Effective Workplace Investigations (with Sample Questions)" was published in *The Practical Litigator*. In September of the same year, her article "Fast Companies Need Fast Lawyers; Speeding Up Dispute Resolutions," was published in *Competitive Edge*. Antonino wrote "Latex Protein Toxic Syndrome Litigation: The Cutting Edge of Toxic Tort Practice," published in *Mealey's Litigation Reports, Drugs and Medical Devices*, in October 1996 and has been quoted in numerous publications, including *Business Week*, on the subject of latex allergy.

She is a member of the American Mensa Society, is listed in the 2000 edition of the National Registry of Who's Who, the 2003-2004 and 2005-2006 editions of *Who's Who in American Law* and was selected by her peers as one of Georgia's Super Lawyers in the 2004, 2005 and 2006 editions. Antonino is admitted to practice before all Georgia state trial and appellate courts, the U.S. District Court for the Northern District of Georgia and the Eleventh Circuit Court of Appeals.



Antonino is a Past President and a former member of the Board of Directors for the Legal Clinic for the Homeless and of the Atlanta Legal Aid Advisory Board.

FRED BAKER

Working on behalf of Motley Rice LLC clients pursuing unfair trade practice and occupational disease litigation, Fred Baker brings a unique set of skills gained by having taken on a number of the most challenging defendants—those comprising Big Tobacco. He played a central role in a number of individual tobacco cases, as well as in the States Attorneys General National Tobacco Litigation.

Baker's desire to acquire fair and just results for his clients has resulted in his management of several of the highly complex mass litigation cases for which Motley Rice attorneys are known. He also has extensive experience in writing and arguing pivotal motions and briefs.

Baker divides his time between the consumer and commercial fraud and the occupational disease and toxic tort practice groups at Motley Rice and is currently focusing on unfair insurance trade practices litigation and welding rod personal injury litigation. Baker earned a J.D. and LL.M from Duke University School of Law in 1993. He was admitted to the South Carolina Bar and New York Bar in 1994, at which time he began working with Motley Rice attorneys.

KEVIN DEAN

For over fifteen years, Kevin Dean has litigated in the areas of personal injury, wrongful death, professional malpractice, products liability, lender liability and commercial/consumer fraud. Dean joined Motley Rice LLC as an Associate in 2004 to focus on the firm's Transportation, Medical and Catastrophic Injury Practice Groups. He was quickly appointed vehicle defect subgroup leader. In late 2005, Dean was asked to serve as team leader on the firm's newest medical malpractice litigation. The litigation, led by Ron Motley, involves the prosecution of possibly thousands of emerging cases involving body snatching and recipients of potentially diseased human tissue. Dean was named a Member of Motley Rice LLC in 2006.

A true lawyer for the people, Dean ardently represents those with limited resources, those victimized and in need of access to the courts. Prior to joining Motley Rice, Dean was a partner with the Law



Offices of J. Edward Bell III, LLC in Georgetown, South Carolina. Before moving to South Carolina in 2001, he was a member of the William S. Stone, P.C. law firm in Blakely, Georgia, and began his career as an associate with The Bennett Law Firm of Valdosta, Georgia. Dean also served as a County Commissioner on the Early County Georgia Board of Commissioners and has the distinguished honor of having been the youngest elected commissioner in this rural south Georgia county's history.

Dean earned an Associates Degree in Criminal Justice and a Bachelor Degree in Political Science from Valdosta State University. He received a Juris Doctor Degree in 1991 from the Cumberland School of Law at Samford University, where he was selected to serve on one the school's nationally published law reviews, the American Journal of Trial Advocacy, publishing "The Right to Jury Trial in ERISA Civil Enforcement Actions." More recently, Dean co-authored an article titled "Dangerous Doors and Loose Latches," appearing in the November 2004 issue of Trial Magazine of the Association of Trial Lawyers of America. He is licensed to practice in Georgia and South Carolina.

PAUL DOOLITTLE

Most kindergartners play with blocks. Five year-old Paul J. Doolittle built them into a podium and stood before his classmates to argue make-believe cases. Hence, a brilliant career as a trial lawyer was born. More than 30 years later, Doolittle has nearly 100 courtroom cases under his belt, including verdicts for victims of mesothelioma and nursing home abuse. Doolittle is one of Motley Rice's lead trial attorneys, overseeing the trial docket and trying cases for clients and co-counsel in asbestos, nursing home abuse, silica, automobile defect and those involving catastrophic injuries.

Doolittle has more than a decade of trial experience. Doolittle earned a B.A. in philosophy in 1989 and a Juris Doctorate in 1993 from the University of South Carolina. In 1993, he joined the Greenville, South Carolina law firm of Foster & Foster. Two years later, he founded his own law firm. In 1996, he began working with Motley and Rice. In 2003, Doolittle was named a member of Motley Rice, LLC.



He is licensed to practice in South Carolina. Doolittle learned many of his courtroom skills from Motley, whose career he had long followed and who has served as a mentor. Before a judge and jury, Doolittle is serious, heartfelt and tenacious.

He feels that helping ordinary people have their day in court is a great honor. He is proud to help individuals level the playing field for any victim who has suffered an injustice. He is relentless in seeking justice for clients.

MIKE ELSNER

Mike Elsner never dreamed that his career choice would result in world travel and meetings with foreign intelligence officers, witnesses and informants. He has had such opportunities, however, leading groundbreaking anti-terrorism litigation with Motley Rice LLC.

Elsner's creativity and his aggressive approach to gathering evidence and pursuing leads are qualities that have enabled him to effectively bring about social change through litigation. His use of the U.S. civil justice system to better protect Americans from the threat of terrorism is an approach that has been invaluable to the more than 6,500 9/11 families and survivors Motley Rice represents.

Elsner is a key member of the 9/11 and Anti-Terrorism Practice Group. He leads the investigatory team that is currently scouring the globe gathering liability evidence for the 9/11 families' civil action against al Qaeda's financiers and for 9/11 aviation litigation.

As The New York Times Magazine noted, such an endeavor is "a worldwide intelligence-gathering operation that makes the discovery process, ordinarily marked by subpoenas and dry depositions, read like a Tom Clancy novel."

To date, Elsner and his team have acquired more than one million pages of documents in thirteen languages about the activities of al Qaeda and the role that its alleged financiers played in providing material support for terrorism.

Elsner also plays a leading role in several of the firm's other terrorism cases including *Almog v. Arab Bank* brought on behalf of thousands of U.S. and Israeli victims who were injured or killed in



terrorist attacks in Israel, a suit against Hilton Hotels brought on behalf of victims of the bombings at the Taba Hilton in Egypt and a suit against the Libyan government for their role in the bombing of Pan Am Flight 103 over Scotland.

After graduating from John Carroll University and receiving a law degree from the University of Memphis in 1997, Elsner began work for the Manville Personal Injury Trust. He partnered with Ron Motley and other attorneys on litigation against Big Tobacco, seeking damages for the harmful effects of smoking on the lungs of asbestos victims. In 2001, Elsner joined the firm of Weitz & Luxenberg, where he worked on asbestos and toxic tort litigation. Through these positions, Elsner gained experience in complex civil litigation in the areas of toxic tort, aviation, security, personal injury, bankruptcy, medical malpractice and whistleblower protections. He officially teamed with Motley Rice attorneys to work on the 9/11 litigation in 2002 and, in 2006, he became a Motley Rice Member.

Elsner has appeared on CNN, ABC, NBC, Fox, MSNBC, National Public Radio, the BBC and the Canadian Broadcasting Company to discuss terrorism litigation and he frequently lectures on the subject. Elsner is licensed to practice in New York, South Carolina and Virginia.

JAMES EVANGELISTA

Jim Evangelista joined Motley Rice LLC as a member in 2006. He primarily works with the firm's Securities and Commercial Fraud practice group. Evangelista has been involved in multiple high profile representations including the StarLink™ genetically modified corn litigation, the Insurance Sales Practices Litigation, the Independent Counsel's investigation of the "Iraqgate" scandal, and the Independent Administrator's oversight of the International Brotherhood of Teamsters. Additionally, Evangelista has prosecuted a number of actions on behalf of a variety of individual plaintiffs in high value commercial litigation, as well as class action securities fraud litigation including a settlement recovery for investors in *In Re Providian Financial Corp. Securities Litigation*, Master File No. C 01-3952 CRB (N.D.Cal.). Evangelista also has extensive experience in electronic discovery issues.